

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
<i>Plaintiff,</i>)	
)	No. 1:17-mc-00151-LPS
v.)	
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
<i>Defendant.</i>)	

**THIRD SUPPLEMENTAL DECLARATION OF NATHAN P. EIMER
IN SUPPORT OF THE VENEZUELA PARTIES' OBJECTIONS TO THE
SPECIAL MASTER'S UPDATED FINAL RECOMMENDATION**

I, Nathan P. Eimer, declare as follows:

1. I am a partner at the law firm of Eimer Stahl LLP, and I am counsel for PDV Holding, Inc. and CITGO Petroleum Corporation in the above-captioned action.
2. I make this declaration in connection with the Venezuela Parties' Objections to the Special Master's Updated Final Recommendation, based upon personal knowledge.
3. Attached as **Exhibit 69**¹ to this declaration is a true and correct copy of excerpts from the transcript of the deposition of Mr. William O. Hiltz, Senior Managing Director at Evercore

¹ The Exhibits described herein are numbered to follow those first identified in the Declaration of Nathan P. Eimer in Support of the Bolivarian Republic of Venezuela, Petróleos de Venezuela, S.A., PDV Holding, Inc., and CITGO Petroleum Corporation's Memorandum of Law in Support of Notice of Objections to the Special Master's Final Recommendation (D.I. 1948-8), the Supplemental Declaration of Nathan P. Eimer in Support of the Venezuela Parties' Response to Objections to the Special Master's Final Recommendation (D.I. 1986), and the Second Supplemental Declaration of Nathan P. Eimer in Support of the Venezuela Parties Reply to Objections to the Special Master's Final Recommendation (D.I. 2043).

Group, L.L.C., taken on September 4, 2025. The deposition transcript has not yet been certified with Mr. Hiltz's signature.

4. Attached as **Exhibit 70** to this declaration is a true and correct copy of the statement of interest submitted by the United States in *Petróleos de Venezuela, S.A. v. MUFG Union Bank, N.A.*, No. 1:19-cv-10023 (S.D.N.Y), ECF No. 393, on August 29, 2025.

5. Attached as **Exhibit 71** to this declaration is a true and correct copy of "Exhibit 13" as so designated during the deposition of Mr. Xiao Song, Managing Director and Portfolio Manager – Emerging Markets with Contrarian Capital Management, L.L.C., and the deponent selected by Red Tree Investments LLC to testify on its behalf, taken on July 29, 2025.

6. Attached as **Exhibit 72** to this declaration is a true and correct copy of "Exhibit 33" as so designated during the deposition of Mr. William O. Hiltz, Senior Managing Director at Evercore Group, L.L.C., taken on August 6, 2025.

7. Attached as **Exhibit 73** to this declaration is a true and correct copy of the Sixth Supplemental Declaration of Randall J. Weisenburger.

8. Attached as **Exhibit 74** to this declaration is a true and correct copy of the letter submitted by the Trustee and Collateral Agent in *Petróleos de Venezuela, S.A. v. MUFG Union Bank, N.A.*, No. 1:19-cv-10023 (S.D.N.Y), ECF No. 394, on September 5, 2025.

9. Attached as **Exhibit 75** to this declaration is a true and correct copy of the Brief of the Bolivarian Republic of Venezuela as *Amicus Curiae* submitted by the Bolivarian Republic of Venezuela in *Petróleos de Venezuela, S.A. v. MUFG Union Bank, N.A.*, No. 1:19-cv-10023 (S.D.N.Y), ECF No. 326-1, on January 15, 2025.

10. Attached as **Exhibit 76** to this declaration is a true and correct copy of the letter submitted by the Trustee and Collateral Agent in *Petróleos de Venezuela, S.A. v. MUFG Union Bank, N.A.*, No. 1:19-cv-10023 (S.D.N.Y), ECF No. 377, on April 3, 2025.

11. Attached as **Exhibit 77** to this declaration is a true and correct copy of the Declaration of Timothy McKenna in Support of the Motion of Defendants and Counterclaim Plaintiffs for Entry of Judgment Directing Payment of Principal and Interest submitted in *Petróleos de Venezuela, S.A. v. MUFG Union Bank, N.A.*, No. 1:19-cv-10023 (S.D.N.Y), ECF No. 225, on November 30, 2020.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed this 6th day of September 2025, in Chicago, Illinois.

/s/ Nathan P. Eimer
Nathan P. Eimer